

### **REMARKS**

In the office action mailed August 11, 2006, the Examiner objected to the title of the invention as being too long. On page 2 of the office action, the Examiner suggested a new title, which the Applicant agrees with and has adopted by the foregoing amendment to the specification.

In addition to amending the title, paragraph [0004] of the specification has been amended to correct an obvious typographical error. In the first sentence of paragraph [0004], the word “modem” has been replaced by --modern-- in two locations. No new matter has been added.

Claims 5 and 19 were objected to as containing typographical errors. In claims 5 and 19, the word “General” should have been --Global--. Claims 5 and 19 have therefore been amended change “General” to --Global--.

Claim 11 was objected to because the word “network” was misspelled as “nework.” Claim 11 has therefore been amended to change “nework” to --network--.

As for the substantive rejections, claims 1, 3-4 and 6-12 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. pre-grant publication number 2003/010927 by Lewis et al., which is referred to hereafter as either “Lewis” or “the Lewis reference.”

Claims 2, 13-18 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Lewis in view of U.S. pre-grant publication number 2002/0136368 by Aoki et al., which is referred to hereafter as either “Aoki” or “the Aoki reference.”

Claim 19 was rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Lewis in view of U.S. pre-grant publication number 2002/0136368 by Aoki et al. and U.S. pre-grant publication number 2006/0004643 by Stadelmann et al., which is referred to hereafter as “Stadelmann” or “the Stadelmann reference.”

Before responding to the substantive rejections, the Applicant directs the Examiner's attention to the fact that by the foregoing amendment, the claims are no longer in the Jepson-style format. The claims also no longer use the term, "at least," the use of which made the claims somewhat difficult to read.

The applicant's deletion of the term "at least" from the claims should not be construed as any sort of subject matter surrender under *Festo*. Rather, the deletion of "at least" is only to make the claims more understandable. In every instance where "at least" has been removed, the claims should still be construed to include one, but also more than one, corresponding element.

Referring now to the substantive rejections based on prior art, after carefully reviewing the specification and claims and after carefully reviewing the prior art cited by the Examiner, the claims have been amended to more carefully articulate the subject matter claimed by the Applicant. For the reasons set forth below, the rejections are believed to be traversed by the foregoing amendments.

Paraphrased, the independent claims have been amended to recite that in a wireless communication system, such as the cellular networks used in the United States or the GSM system used in Europe and elsewhere, a communications device, e.g., a mobile phone or mobile node, operating on a network can request (or otherwise obtain) from the network, a "short dialing code," that can be used by the phone to dial a "service center" for a particular geographic area wherein the mobile device is located and being used. The "service centers" for which "short dialing codes" are obtained, are clearly described in the specification text as places or entities that render *real services*. Examples of "service centers" given in the specification include emergency service providers, such as police and fire departments. As used in the claims of this application, "service center" does not include a telephone switching system, *per se*, such as a router.

As is also made clear from the specification, a "short dialing code" is a short telephone number, such as "9-1-1" or "4-1-1." In the United States for example, when the numbers "9-1-1" are dialed from either a land-line telephone or from a cellular phone, a connection is made to

an emergency service *center* that provides emergency services to a limited geographic area, i.e., an area from where the call was placed.

Importantly, the term “short dialing code” should not be construed to mean *only* three digits. “Short dialing code” should be construed to mean a shortened telephone number, the use of which can be used to place a telephone call to the corresponding service center. “Short dialing code” can include one digit, 2 digits, 3 digits, 4 digits, etc., the use of which causes a call to be routed to a particular service center. In addition, as stated in the specification, a “short dialing code” is a telephone number used to call a “service center” for a particular geographic area.

By using the method and apparatus recited in each of the independent claims, a mobile phone (or a mobile phone user) can request (or be sent) one or more “short dialing codes” from the communications network. The use of the short dialing code by the phone will enable the phone to be connected to an appropriate service center that provides corresponding services in an area or country where the phone happens to be operating. In other words, when a “short dialing code” received from network is transmitted by the phone, the network will connect the phone to the proper service center for the geographic area wherein the phone is being used when it received the “short dialing code” from the network.

Importantly, as the phone moves from one geographic area to another, or from one country to another, the short dialing codes for particular services centers can change. New short dialing codes downloaded from the network into the phone will insure that the phone will always be able to reach the local police, fire or other service centers.

Support for the amendments to the claims can be found through-out the Summary and the Detailed Description. No new matter has been added.

Referring now to the Lewis reference on which every claim rejection was based, Lewis is concerned with and directed only to a methods and devices by which messages in one format for one device can be revised into a different format for a different device. Lewis is unconcerned with placing telephone calls to “service centers.” Lewis does not teach, show or even suggest the

use of short dialing codes to call a service center and Lewis does not show or suggest the transmission of any sort of dialing code for calling a “service center” for a particular geographic area.

Unless the Examiner can identify by column and line number where each and every limitation of the amended claims can be found in the Lewis reference, each of the independent claims must be allowed to issue over Lewis. Neither Lewis nor any other reference cited by the Examiner shows or suggest the limitations of the independent claims. Those claims are therefore allowable over the prior art. Since the independent claims are allowable over the cited art, each of the claims that depend from them is also allowable. Reconsideration of all of the claims is therefore respectfully requested.

The applicant further acknowledges the Examiner’s note that the certified copy of the priority document pertaining the priority claim has not been submitted. The applicant shall submit a certified copy by separate letter.

Respectfully submitted,

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